

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

KATHRYN TOWNSEND GRIFFIN, HELEN  
MCDONALD, and THE ESTATE OF CHERRIGALE  
TOWNSEND,

*Plaintiffs,*

-against-

EDWARD CHRISTOPHER SHEERAN, p/k/a ED  
SHEERAN, ATLANTIC RECORDING  
CORPORATION, d/b/a ATLANTIC RECORDS,  
SONY/ATV MUSIC PUBLISHING, LLC, and  
WARNER MUSIC GROUP CORPORATION, d/b/a  
ASYLUM RECORDS

*Defendants.*

ECF CASE

17-cv-5221 (LLS)

**NOTICE OF MOTION –  
DEFENDANTS’ SEVENTH  
MOTION IN LIMINE**

**PLEASE TAKE NOTICE**, that upon the accompanying Declarations of Donald S. Zakarin and Dr. Lawrence Ferrara and the accompanying Memorandum of Law, Defendants Edward Christopher Sheeran, Atlantic Recording Corporation and Sony Music Publishing (US) LLC (f/k/a Sony/ATV Music Publishing LLC) will move this Court, before the Honorable Louis L. Stanton at the Daniel Patrick Moynihan United States Courthouse, Courtroom 21C, 500 Pearl Street, New York, New York, 10007, on a date and time to be determined by the Court, for an Order precluding Plaintiffs from introducing at trial their proposed performance of the *Let's Get It On* Deposit Copy as recorded on Audio Exhibit 1 and Audio Exhibit 2, which Audio Exhibits are annexed to the accompanying Declaration of Donald S. Zakarin. The reasons and grounds for this motion are more fully described in the accompanying papers.

Oral argument, if any shall be directed by the Court, shall be held on a date and at a time designated by the Court.

Dated: New York, New York  
February 24, 2023

PRYOR CASHMAN LLP

By:/s/ Donald S. Zakarin  
Donald S. Zakarin  
[dzakarin@pryorcashman.com](mailto:dzakarin@pryorcashman.com)  
Ilene S. Farkas  
[ifarkas@pryorcashman.com](mailto:ifarkas@pryorcashman.com)  
Andrew M. Goldsmith  
[agoldsmith@pryorcashman.com](mailto:agoldsmith@pryorcashman.com)  
7 Times Square  
New York, New York 10036-6569  
Telephone: (212) 421-4100  
Facsimile: (212) 326-0806

*Attorneys for Defendants*

TO:

Frank & Rice, P.A.  
325 West Park Avenue  
Tallahassee, Florida 32301  
(850) 629-4168  
*Attorneys for Plaintiffs*